

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MARY RIVARD,

Plaintiff,

V.

HOME DEPOT U.S.A., INC.

Defendant.

CIVIL ACTION NO.:

04-40247 FDS

PROPOSED SCHEDULING ORDER

The parties to this action, plaintiff Mary Rivard ("Plaintiff") and defendant Home Depot U.S.A., Inc., ("Home Depot"), submit this Proposed Scheduling Order pursuant to Local Rule 16(b) and Local 16.1(F). All of the proposals contained in this motion are made jointly by Plaintiff and Home Depot.

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by May 16, 2005.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after June 30, 2005.
3. **Fact Discovery Interim Deadlines.**
 - a. All requests for production of documents and interrogatories must be served by September 30, 2005.
 - b. All requests for admission must be served by December 31, 2005.
 - c. All depositions, other than expert depositions, must be completed by December 31, 2005.
4. **Fact Discovery Final Deadline.** All discovery, other than expert discovery, must be completed by December 31, 2005.
5. **Status Conference.** A status conference will be held sometime in January, 2006.

6. **Expert Discovery.**

- a. Plaintiff(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by January 15, 2006.
- b. Plaintiff(s)' trial experts must be deposited by April 30, 2006.
- c. Defendant(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by February 28, 2006.
- d. Defendant(s)' trial experts must be deposited by April 30, 2006.

7. **Dispositive Motions.**

1. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by May 7, 2006.
2. Oppositions to dispositive motions must be filed within 21 days after service of the motion.

The parties to the above captioned action submit the following Proposed Scheduling Order. The undersigned counsel conferred in order to discuss and develop the following plan.

MARY RIVARD

By her Attorney,

RONCONE LAW OFFICES, P.C.

/s/ John L. Roncone
John L. Roncone (BBO# 426660)
142 Main Street
Leominster, MA 01453

HOME DEPOT USA, INC.

By its Attorneys,

**CAMPBELL CAMPBELL EDWARDS &
CONROY, P.C.**

/s/ Christopher A. Callanan
James M. Campbell (BBO# 541882)
Christopher A. Callanan (BBO# 630649)
One Constitution Plaza
Boston, MA 02129
(617) 241-3000

Dated: April 12, 2005